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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

CHRISTINE RUSH,

Plaintiff,

v.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

Civil No. 1:22-cv-00417-GSA

**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S
COMPLAINT**

The parties stipulate through counsel that Defendant, the Acting Commissioner of Social Security (the "Commissioner"), shall have an extension of time to respond to Plaintiff's Complaint in this case. In support of this request, the Commissioner respectfully states as follows:

1. Defendant's response to Plaintiff's Complaint is due July 12, 2022. Defendant has not previously requested an extension of this deadline.

2. The certified administrative record (CAR) in this case has not yet been finalized for filing. Counsel for the Commissioner has been in contact with the Office of Appellate Operations, which is responsible for preparation of CARs and is actively working on certifying the CAR. Accordingly, Defendant requests an extension of 45 days to respond to Plaintiff's Complaint.

1 3. Counsel for the Commissioner has consulted with Plaintiff's counsel who advised that he
2 has no objections.

3 4. This request is made in good faith and is not intended to delay the proceedings in this
4 matter.

5 WHEREFORE, Defendant requests until August 26, 2022, respond to Plaintiff's opening brief.

6 Respectfully submitted,

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8 Date: July 8, 2022

LAW OFFICES OF FRANCESCO BENAVIDES

9 By: /s/ Caspar Chan for Francesco Benavides*

10 FRANCESCO BENAVIDES

11 *Authorized by email on July 8, 2022

Attorneys for Plaintiff

12 Date: July 8, 2022

PHILIP A. TALBERT

13 United States Attorney

14 Eastern District of California

15 By: /s/ Caspar Chan

CASPAR CHAN

16 Special Assistant United States Attorney

17 Attorneys for Defendant

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20 ORDER

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22 IT IS SO ORDERED.

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24 Dated: July 8, 2022

/s/ Gary S. Austin

25 UNITED STATES MAGISTRATE JUDGE
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